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December 6, 2019

By ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ademola Adebogun,
19 Cr. 291 (LAP)

Dear Judge Preska:

I am the attorney for Ademola Adebogun, the defendant in the above-captioned matter, who is currently on pretrial release. Among Mr. Adebogun's conditions are travel restrictions that limit his travel to the Southern and Eastern Districts of New York and the District of New Jersey. I write to respectfully request a temporary modification of Mr. Adebogun's travel restrictions to permit him to travel internationally to Lagos, Nigeria for employment purposes from December 30, 2019 to January 14, 2020. My office has conferred with Mr. Adebogun's Pretrial Services Officer, Andrew Kessler-Cleary, who takes no position as a matter of office policy with respect to international travel requests. He reports that Mr. Adebogun is in compliance with the conditions of his release to date. AUSA Daniel Wolf opposes the request.

As the Court is aware from counsel's previous applications, Mr. Adebogun is the owner of an entertainment and marketing company, Africalabash Entertainment. For the last four years, Mr. Adebogun, through his company, has personally hosted an annual New Years' event in Lagos, Nigeria. Now in its fifth year, the event is scheduled for January 5, 2020, and Mr. Adebogun informs me that his presence is required in Lagos in

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order for the event to proceed. This is because Mr. Adebogun is the sole person responsible for promoting the event in Lagos, which involves marketing, securing guest attendance, and serving as the contact person for those attending or interested in attending. If he is not there to promote the event it will ultimately be canceled. Mr. Adebogun expects to earn a substantial profit from this work (he receives a percentage of the money earned, which is determined by the number of guests who attend), but he will receive nothing if it is canceled.

Mr. Adebogun has provided his travel information to Officer Kessler-Cleary, which includes a proposed flight itinerary¹ and the address where he will be staying in Lagos (his family's home). The Court previously granted Mr. Adebogun's request to travel to Nigeria in July 2019 to attend his father's memorial service. Mr. Adebogun did so without any issues, and returned to New York as required.

Additionally, a status conference was recently scheduled for January 8, 2020 at 11:00 a.m. If the instant request is granted, Mr. Adebogun would be in Nigeria at the time of the status conference. It is therefore also respectfully requested that Mr. Adebogun's appearance at the January 8 conference be waived. If the Court desires, Mr. Adebogun would be available to individually appear for a status conference on a date and time that is convenient for the Court either before or after his proposed travel dates.

Accordingly, it is respectfully requested that Mr. Adebogun's conditions of release be temporarily modified to authorize travel to Lagos, Nigeria from December 30, 2019 to January 14, 2020 (unless his flight itinerary changes).

¹Mr. Adebogun intends to purchase a departing flight for December 30, 2019 and a return flight for January 14, 2020, which are the most cost-efficient flight options. He has not yet purchased the flights and will only do so if the Court grants this application. In that event, the precise dates of his travel may change depending on the flight availability at the time of booking. We will of course notify pretrial services of any changes in his proposed itinerary.

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If the Court has any questions regarding this application
please contact my office.

Thank you for your attention to this matter.

Respectfully submitted,



A handwritten signature in blue ink, appearing to read "R.A. Solloway (P)" where "(P)" likely stands for "Pro Se".

Robert A. Solloway

cc: Daniel Wolf (by Email)
Assistant United States Attorney

Andrew Kessler-Cleary (by Email)
U.S. Pretrial Services Officer